

1 Steven J. Parsons  
Nevada Bar No. 363  
2 Joseph N. Mott  
Nevada Bar No. 12455  
3 LAW OFFICES OF STEVEN J. PARSONS  
10091 Park Run Dr Ste 200  
4 Las Vegas, NV 89145-8868  
(702) 384-9900  
5 (702) 384-5900 (fax)  
[Steve@SJPlawyer.com](mailto:Steve@SJPlawyer.com)  
6 [Jmott@SJPlawyer.com](mailto:Jmott@SJPlawyer.com)

7 Attorneys for Plaintiff  
ABC INDUSTRIAL LAUNDRY, LLC  
8

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 ABC INDUSTRIAL LAUNDRY, LLC, a Nevada  
limited liability company, dba UNIVERSAL  
12 LAUNDRY and SUPPLY,

13 Plaintiff,

14 vs.

15 FEDERAL INSURANCE COMPANY, an  
Indiana corporation; et al.,

16 Defendants.  
17 \_\_\_\_\_/

Case No. 2:15-cv-869-RFB-(VCF)

STIPULATION AND [PROPOSED] ORDER  
TO EXTEND TIME FOR PLAINTIFF TO  
RESPOND TO DEFENDANT FEDERAL  
INSURANCE COMPANY'S  
MOTION FOR SUMMARY JUDGMENT  
(Doc. No. 38)

FIRST REQUEST

18 Plaintiff ABC INDUSTRIAL LAUNDRY, LLC, by its attorneys, Steven J. Parsons and  
19 Joseph N. Mott of LAW OFFICE OF STEVEN J. PARSONS, and Defendant FEDERAL INSURANCE  
20 COMPANY, by its attorneys, James P.C. Silvestri and Brian Goldman of PYATT SILVESTRI, hereby  
21 stipulate that Plaintiff's Response to Federal Insurance Company's Motion for Summary  
22 Judgment (Doc. No. 38) shall be extended fifteen (15) judicial days, and shall now be due on  
23 Monday, March 27, 2017.

24 . . .

25 . . .

26 . . .

27 . . .

1 This stipulation is made in good faith and is not for the purposes of delay.

2 Among the factors existing is that Plaintiff's lead counsel, Steven J. Parsons, has been  
3 substantially away from the office due to illness and the need of medical care for a chronic  
4 condition, for the period succeeding the first of two surgeries on December 22, 2016.

5 Dated: Tuesday, March 7, 2017.

6 LAW OFFICES OF STEVEN J. PARSONS

PYATT SILVESTRI

7 /s/ Steven J. Parsons  
8 STEVEN J. PARSONS  
9 JOSEPH N. MOTT  
10091 Park Run Dr Ste 200  
Las Vegas, NV 89145-8868

/s/ Brian Goldman  
JAMES P.C. SILVESTRI  
BRIAN GOLDMAN  
701 E Bridger Ave Ste 600  
Las Vegas, NV 89101-8941

10 Attorneys for Plaintiff  
11 ABC INDUSTRIAL LAUNDRY, LLC

Attorneys for Defendant  
FEDERAL INSURANCE COMPANY

12 **ORDER**

13 **IT IS SO ORDERED.**

14 Dated: March 8, 2017.

15   
16 RICHARD F. BOULWARE, II  
17 United States District Judge  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27